## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

IN RE:	) MDL No. 1285
VITAMINS ANTITRUST LITIGATION	) Misc. No. 99-0197 (TFH)
This Document Relates to:	APR 2 3 2002
ALL ACTIONS	NANCY MAYER WHITTINGTON, CLERK U.S. DISTRICT COURT

## STIPULATION REVISING SCHEDULE FOR CONAGRA'S RESPONSE TO PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS OR IN THE ALTERNATIVE FOR A PRIVILEGE LOG DETAILING REDACTIONS TO DEFENDANT CONAGRA, INC.

ConAgra, Inc. ("ConAgra") and the Non-Class Direct Action Plaintiffs in the above-referenced consolidated actions respectfully request Court approval of the following stipulation revising the briefing schedule for ConAgra's response to Plaintiffs' Motion to Compel. The parties are mindful of the Court's admonition on April 17, 2002 that the parties should continue attempts to resolve discovery disputes and are in the process of negotiating a resolution to the instant motion to compel. Additional time beyond the existing briefing schedule is necessary in order to meet and confer regarding the request presented in Plaintiffs' motion. Accordingly, pursuant to the parties' discussions with the Special Master, the parties submit the following agreed-upon stipulation for the Court's consideration:

- 1. The revised briefing schedule for Plaintiff's Motion Plaintiffs' Motion to Compel Production of Documents or in the Alternative for a Privilege Log Detailing Redactions to Defendant ConAgra, Inc. shall be as follows:
  - a. Plaintiffs will notify ConAgra on or before April 23, 2002 whether they intend to pursue the motion.

- b. If Plaintiffs continue to pursue the motion, ConAgra's Response shall be filed on or before April 26, 2002.
- c. Plaintiffs' Reply shall be filed on or before May 1, 2002.

Respectfully submitted,

**DECHERT PRICE & RHOADS** 

LOMMEN, NELSON, COLE & STAGEBERG, P.A.

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Dated: April 19, 2002

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On behalf of all Direct Action Plaintiffs

SO ORDERED, this 21 day of 1, 2002

Thomas F. Hogan

United States District Court Judge